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Proposed Attorneys for Debtor

11 UNITED STATES BANKRUPTCY COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 OAKLAND DIVISION

14 In re
15 Round Table Pizza, Inc.,
16 Debtor.

Case No. 11-41431 RLE
(Jointly Administered with Case Nos.
11-41432 RLE, 11-41433 RLE, and
11-41434 RLE)

Chapter 11

**EX PARTE APPLICATION FOR ORDER
EXTENDING TIME TO FILE
SCHEDULES AND STATEMENT OF
FINANCIAL AFFAIRS**

1 Round Table Pizza, Inc., The Round Table Franchise Corporation, Round Table
2 Development Company, and Round Table Pizza Nevada LLC, the jointly administered debtors
3 and debtors-in-possession in the above captioned Chapter 11 reorganization cases (collectively
4 "Round Table" or the "Debtor"), hereby jointly submit this *ex parte* application for an order
5 extending time to file schedules and their statement of financial affairs pursuant to Federal Rule of
6 Bankruptcy Procedure 1007(c) (the "Application to Extend Time"). In support of this Application
7 to Extend Time, Round Table respectfully represents as follows:

8 Round Table filed its voluntary petitions under Chapter 11 of title 11 of the United States
9 Code on February 9, 2011 (the "Petition Date").

10 There are two core aspects to Round Table's business: acting as a franchisor to
11 independent third party owner-operators and operating company-owned stores. Round Table
12 currently has 355 franchised stores, owned and operated by 148 franchisees. Round Table also
13 operates 128 company-owned stores.

14 A more complete presentation of Round Table's background, the circumstances which led
15 to the instant Chapter 11 filing, and Round Table's expectations regarding its reorganization is set
16 forth in the DECLARATION OF J. ROBERT MCCOURT IN SUPPORT OF FIRST DAY MOTIONS filed on
17 February 9, 2011 [docket no. 13].

18 Because of the size and nature of Round Table's operations, preparing complete and
19 accurate schedules and a statement of financial affairs within the time provided by Rule 1007(c)
20 would be impractical, or at least extremely burdensome. Round Table believes that a brief
21 extension of time would not prejudice the rights of its creditors. Further, Round Table believes
22 this would be in the best interests of all parties, as it would facilitate preparation of more complete
23 and accurate documents.

24 Round Table's counsel has contacted the Office of the United States Trustee, and has been
25 advised that the United States Trustee does not object to a brief extension of time for Round Table
26 to file its schedules and statement of financial affairs.

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1 **WHEREFORE**, Round Table respectfully requests entry of an Order:

2 1. That Round Table's deadline for filing its schedules and its statement of financial
3 affairs is extended to March 14, 2011, without prejudice to applications for additional extensions
4 of time for good cause shown; and

5 2. For such other and further relief as the Court deems just and proper.

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7 DATED: February 18, 2011

McNUTT LAW GROUP LLP

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By: /s/ Scott H. McNutt

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Scott H. McNutt

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Attorneys for Debtor

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